

FILED
U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

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IN THE UNITED STATES DISTRICT COURT U.S. DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO NORTHERN DISTRICT OF OHIO
CLEVELAND
EASTERN DIVISION

UNITED STATES OF AMERICA,)	SUPERSEDING
)	INDICTMENT
Plaintiff,)	
)	JUDGE: SOLOMON OLIVER, JR.
v.)	
)	
JESUS COTA MEDINA,)	CASE NO. 5:18CR182
DEON JOHNSON,)	Title 18, Sections 922(g)(1),
MICHELLE DAILEY)	924(c)(1)(A), 1952(a)(3) and 2,
SHAUHEEN SOHRABI,)	United States Code; Title 21,
JOSEPH TERLIZZI,)	Sections 841(a)(1), (b)(1)(A),
TYRONE ROGERS,)	(b)(1)(C), 843(b), 846, and 853,
HECTOR MANUEL RAMOS-NEVAREZ,)	United States Code
GILBERT TREVISO-GARCIA,)	
)	
)	
Defendants.)	

COUNT 1

(Conspiracy to Manufacture and Possess with Intent to Distribute a Controlled Substance,
in violation of 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

The Grand Jury charges:

1. Beginning as early as January 1, 2018, and continuing through August 1, 2018, the exact dates to the Grand Jury unknown, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants JESUS COTA MEDINA, DEON JOHNSON, MICHELLE DAILEY, SHAUHEEN SOHRABI, JOSEPH TERLIZZI, TYRONE ROGERS, HECTOR MANUEL RAMOS-NEVAREZ, GILBERT TREVISO-GARCIA, and others known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree together and with each other, and with diverse others known and unknown to the Grand Jury, to manufacture and possess with intent to distribute 500 grams or more of a mixture of

substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), and 846.

MANNER AND MEANS OF THE CONSPIRACY

2. It was part of the conspiracy that JOHNSON, while incarcerated, organized, orchestrated, and planned to distribute methamphetamine in the Northern District of Ohio, by making phone calls to various co-conspirators, including ROGERS, DAILEY, COTA MEDINA, and others.

3. It was part of the conspiracy that DAILEY and ROGERS traveled from the Northern District of Ohio to Mexico for the express purpose of creating a drug trafficking chain of supply, organized by COTA MEDINA and JOHNSON.

4. It was part of the conspiracy that DAILEY and others, taking direction from JOHNSON, instructed ROGERS and others on how to execute drug trafficking activities in the Northern District of Ohio.

5. It was part of the conspiracy that JOHNSON, ROGERS, TERLIZZI, and others arranged, through SOHRABI, to use a warehouse located in the Northern District of Ohio, Eastern Division, for the express purpose of making crystal methamphetamine and preparing it for sale.

6. It was part of the conspiracy that RAMOS-NEVAREZ and TREVISO-GARCIA traveled to the Northern District of Ohio for the express purpose of making and selling methamphetamine.

7. It was part of the conspiracy that ROGERS, TERLIZZI, and others distributed narcotics on behalf of the drug trafficking organization (DTO).

8. It was part of the conspiracy that ROGERS, DAILEY, and others, used numerous vehicles, including rental cars, for the purpose of transporting and distributing narcotics without law enforcement detection.

9. It was part of the conspiracy that conspirators COTA MEDINA, TERLIZZI, ROGERS, JOHNSON, SOHRABI, and others, used telephones, in particular, multiple prepaid cellular telephones, to communicate with other conspirators and/or drug customer, and that they changed cellular telephones frequently. Specifically, it was part of the conspiracy that co-conspirators used cellular telephones to make and receive telephone calls, and to send and receive text and other electronic messages, to conduct their drug trafficking activity. To reduce the risk of being detected by law enforcement, and to conceal the identity of the person using the device, co-conspirators often used cellular telephones that had been obtained in the names of other persons or in fictitious names. It was further part of the conspiracy that co-conspirators, when using cellular phones to conduct drug trafficking activity, used slang terms, street terminology, and code words or phrases to obscure and to disguise the true nature of their activities, and the true meaning of their conversations.

ACTS IN FURTHERANCE OF THE CONSPIRACY

10. In furtherance thereof, and to effect the goals and conceal the existence of the conspiracy, Defendants and others performed overt acts in the Northern District of Ohio, Eastern Division and elsewhere, including but not limited to the following:

11. Sometime in early January 2018, ROGERS and DAILEY traveled from Cleveland, Ohio to Tucson, Arizona.

12. On or about January 12, 2018, ROGERS and DAILEY traveled to Mexico from Arizona. While there, DAILEY met with COTA MEDINA, and through the phone, JOHNSON and COTA MEDINA spoke about narcotics shipments to the Northern District of Ohio.

13. ROGERS and DAILEY crossed back into the United States on January 12, 2018 at the Nogales West Border Crossing in Nogales, Arizona. DAILEY was driving a rented vehicle.

14. On or about February 7, 2018, ROGERS sent COTA MEDINA \$999.00 dollars via Western Union. COTA MEDINA retrieved the money in Sonora, Mexico.

15. On or about March 5, 2018, ROGERS sent COTA MEDINA \$300.00 dollars via MoneyGram. The expected destination listed on the MoneyGram receipt was Mexico.

16. On or about March 8, 2018, TREVISO-GARCIA entered the United States at the Nogales, Arizona Port of Entry from Mexico on a visitor's visa. TREVISO-GARCIA indicated his intended destination was Las Vegas, Nevada.

17. On or about March 12, 2018, RAMOS-NEVAREZ entered the United States at the Nogales, Arizona Port of Entry from Mexico on a visitor's visa. RAMOS-NEVAREZ indicated his intended destination was Phoenix, Arizona.

18. On or about March 21, 2018, at approximately 3:21 p.m., JOHNSON called ROGERS on the telephone. During the conversation, JOHNSON asked, "What's happening?" ROGERS responded, "S*^t, 'bout to go grab them and take them (TREVISO-GARCIA and RAMOS-NEVAREZ) down here. I'm... telling dude, like, I don't know. Dude's crazy....yea Imma stop and take them to ... garage real quick....The warehouse (a warehouse located at xxxx Old Eight Road, Hudson, Ohio)." JOHNSON asked, "Everything cool, ain't it?" ROGERS responded, "Yea everything ... Like I, like I said... my time is, is like. . . . You know, I know your time is valuable too. But at the end of the day. Man, I, got to get out here and do what I got to do." JOHNSON asked, "You try telling this to Champ (SOHRABI)?" ROGERS stated, "Yea, I'm like. He like, 'oh man you could've just told me.' I already told you that! Man, what I'm gonna have to do." JOHNSON replied, "Right. He gonna, he gonna wish he had the most

property of what." ROGERS then dialed a phone number and added COTA MEDINA as a third party to the call. During the conversation between JOHNSON and COTA MEDINA on ROGERS' line, JOHNSON said, "Oh, oh, yeah that's good. Brother, what happened yesterday with your, your nephew, your niece (drug customer)?" COTA MEDINA replied, "Yes, she took.... What happened? She took thirty (30) (a quantity of drugs), brother. Everything was good." JOHNSON said, "We are, we are working very, very, hard to prepare the windows (methamphetamine). We do not want to give the benefits to another person." COTA MEDINA responded, "Oh no, no, no brother! Everything is good. It's because we need to sell, brother. We need to sell because we need to, we need to collect the money soon. Because we want to move the Cadillacs (cocaine), brother. We need to take them out boom-boom, do you understand me? So then my niece went for thirty (30) and she didn't pay me. She's going to pay it in a week. Do you understand? She's going to take the money to Cleveland. Do you understand me? There's three hundred and fifty (350) windows (a quantity of methamphetamine), brother. So like, you're not, you're not... there's going to be a lot.... So we need to sell right away. We need to sell everything right away, brother. Everything quickly, because we need to collect the money to buy. For the Cadillacs (cocaine), do you understand me? The Cadillacs (cocaine) are there in Cleveland. So then...." Johnson stated, "Okay, okay yea okay. Thank you. I understand now. Yeah." COTA MEDINA replied, "So then, if you can sell a hundred, two hundred, three hundred, tell me brother. There's not a problem. We need to, what we need to do is move right away. What happened with the sample (of drugs) that TY received? Did they like it or did they not like it? What, what's going on, because they're ready there in Phoenix to send, to send them whole. Do you understand me? To send the food (cocaine) whole." JOHNSON said, "He had three people, uh, check out the material (narcotics). Each one of the people said that they can ... four (4) more. But uh, other people were saying that

they wanted to wait until today. So then the people uh, were already using another material.” The conversation continued, and COTA MEDINA asked, “Another thing, what happened with the... with the windows that you have there with the, with the ice (methamphetamine)? You have been able to send anything yet? Have you sold anything?” JOHNSON replied, “Oh, yea...two people already... This morning each one of them is coming to, to check the material. So now I have to call to, to know. One, I already called one person, and they said that they were very happy with the material (quality of methamphetamine). So now I have to call the other people, but afterwards both of the people are going to do a lot of business with us. And I have another person that, I already told you two days ago that I had another person that wanted to do business.... Everything is going well. But first the people want to make sure that we have the right material (drugs) because there are people here. Some other companies here that have dirty material (sub-quality narcotics). Do you understand me?” COTA MEDINA responded, “Check and check the thing about the sample, so that you can tell me. So that I can send you the packages early tomorrow.”

19. On or about March 21, 2018, at approximately 3:34 p.m., ROGERS called TREVISO-GARCIA, and stated, “I’m outside.”

20. On or about March 21, 2018, at approximately 8:09 p.m., JOHNSON called ROGERS on the telephone. During the conversation, JOHNSON asked, “I was on the phone with them over there. They trying to find out if, do you want that situation (cocaine) or not?” ROGERS responded yes, and explained, “I told them to come on with it. One dude says its good on the first round (only one cut, or dilution, of the cocaine supply). Everyone else said they would f*^k with it except for two people. “I don’t know about girly’s people.” JOHNSON replied, “She still waiting on them to tell her something.” ROGERS said, “Yea that’s the route, I be telling you though, my peoples’ be doing, I be like, you know how, you know how the one

joint is. . . . You know can just take it from somebody and boom, it's right there. This drug, you know what I'm saying, this drug you got to ... it's a process with it, you know what I'm saying? I was trying to see what girly people was saying too you know, before I make that shot."

JOHNSON replied, "Right. I just talked to her not too long ago. Talking about they still ain't said nothing to her. Call her, let's call her on three-way right quick, see what she says."

ROGERS said he would add the call, and dialed a number. Attempting to speak to the third party, JOHNSON said, "Hello. Shell (DAILEY)?" ROGERS explained that the call to the third party went through, "But she didn't answer.... Hold on, this girly. Hold on. Hello? Oh, that wasn't her that was someone else. I thought it was her flip phone."

21. On or about March 21, 2018, at approximately 10:45 p.m., JOHNSON called ROGERS again. ROGERS told JOHNSON, "Yeah, I went over that and seen the fight for myself, man." JOHNSON said, "Right. What happened?" ROGERS replied, Yeah, I went up to the fifth round.... I went from the fifth round and worked my way down. So I went to two. I gave, you know, I went to ten people. Boom, boom, boom. Everybody said man, Canelo gonna knock the triple G out in the second round... That's the honest truth (the cocaine's quality was best when cut twice, as opposed to other "rounds," or cycles of cut)." JOHNSON replied, "Okay. Alright. Now what you got to decide if it worth it to you. Is the fight worth it (is it valuable)?" ROGERS said, yea, but they gotta see... I gotta see what people betting on the fight....That's an easy seventy-five dollars a ticket (price per quantity of cocaine)." JOHNSON replied, "Right, so just saying...based upon what you telling me right now. What do you think is a good number (price) for them?" ROGERS said, "If they can say forty-five, is cool. If they forty that's even better but you know, at least give us some type of something..."

22. On or about March 21, 2018, at approximately 10:56 p.m., ROGERS received a phone call from COTA MEDINA. COTA MEDINA stated, "You know Hector (RAMOS-

NEVAREZ)? The guys, where we deal with them? If the guy asks him questions or something like that, let me know. They know not to say nothing to him. Nothing. He's (RAMOS-NEVAREZ) only supposed to cook it, (methamphetamine) and that's it. Okay?"

23. On or about March 22, 2018, at approximately 9:51 a.m., RAMOS-NEVAREZ called ROGERS. During the call, ROGERS stated, "I'm up...I'm about to grab Gil (TREVISOGARCIA) and then will head straight to you." RAMOS-NEVAREZ asked if ROGERS was going to pick RAMOS-NEVAREZ up, and ROGERS said he would call RAMOS-NEVAREZ when he was 10 minutes away. ROGERS stated he had the money to pay for the hotel room (at the La Quinta Inn Macedonia, Ohio) so they could get this out of the way.

24. On or about March 22, 2018, at approximately 10:12 a.m., ROGERS called TREVISOGARCIA. During the call, ROGERS told TREIVSO-GARCIA that he was outside. Around the same time, ROGERS was near The Residences at Barrington Apartments, 226 Barrington Place East, Aurora, OH 44202, Apartment 240.

25. On or about March 22, 2018, at approximately 10:32 a.m., ROGERS called RAMOS-NEVAREZ. During the call, ROGERS told RAMOS-NEVAREZ he was approximately 10 minutes away. ROGERS stated, "I'm about to come and help you out with this." Around this same time, ROGERS was in the vicinity of the LaQuinta Inn and Suites in Macedonia, Ohio.

26. On or about March 22, 2018, at approximately 11:26 a.m., ROGERS received a call from DAILEY. During the conversation, DAILEY stated, "I got two seven's and a six (ratings for quality of cocaine)." ROGERS responded, "Two seven's and six?" DAILEY said, "Yeah." ROGERS asked, "You went all the way to six rounds (cuts of cocaine)...you, you, how many rounds they put, they go?" DAILEY responded, "I don't know." ROGERS then said, "I took it to my peoples personally, and I did five rounds, four rounds, three rounds, two rounds,

one rounds and all the people I gave the stuff to they say, you know...you know they didn't like the fifth round, people didn't like the fourth round, people didn't like the third round. Everybody liked the second and the first round. So we really can only go up to the second round. I mean it was a nine, on the second round, we was, it was past two rounds (cut the cocaine more than twice) it is gonna be garbage, you know what I'm saying?" DAILEY responded, "Yeah, man."

27. On or about March 22, 2018, at approximately 11:37 a.m., ROGERS received an incoming call from JOHNSON. During the conversation, JOHNSON asked, "What you into?" ROGERS responded, "Working...I'm working right now, just tryin' to pick...everything. Just get everything out the way. We'll be all the way out the way." JOHNSON said, "You'll be all the way, out, out the way? You'll be finished today (finished cooking methamphetamine into crystal meth, or ice)?" ROGERS said, "Yeah, some tomorrow... get complete." JOHNSON responded, "Okay, alright." ROGERS then said, "We just getting out of the way. Out of Champ's (SOHRABI) peoples' way. You know what I'm saying? Getting out, getting out of his way. We going...back to the city." JOHNSON asked, "Who got back to the city? Them?" ROGERS said, "and the two dudes (TREVISO-GARCIA and RAMOS-NEVAREZ). We in Macedonia." JOHNSON asked, "You picked the spot for 'em?" ROGERS said, "Yeah I got everything ready." JOHNSON said, "Then you can, you can go to work." Later in the conversation, JOHNSON asked, "Who, who, who all knows where, where, where the new place is at?" ROGERS said, "Nobody." JOHNSON asked, "You sure?" ROGERS said, "I'm positive." JOHNSON told him to "keep it that way."

28. On or about March 22, 2018, at approximately 11:50 a.m., ROGERS was driving a black Ford Fusion parked in front of a warehouse located at XXXX Olde 8 Road in Hudson, Ohio.

29. On or about March 22, 2018, at approximately 1:40 p.m., ROGERS left the warehouse in Hudson, Ohio, and drove to the LaQuinta Inn and Suites in Macedonia, Ohio.

30. On or about March 22, 2018, at approximately 1:46 p.m., RAMOS-NEVAREZ and TREVISO-GARCIA exited the area of the La Quinta Inn and Suites, and entered the car ROGERS was driving. ROGERS drove away. At approximately 2:06 p.m., RAMOS-NEVAREZ and TREVISO-GARCIA exited ROGERS' vehicle, and entered Apartment 240 at the Barrington Apartments, carrying luggage.

31. On or about March 22, 2018, at approximately 3:10 p.m., TERLIZZI, called ROGERS. TERLIZZI stated that he was "on the west side making it running." During the conversation, ROGERS asked TERLIZZI, "What you want?" TERLIZZI responded, "S*^t, 32 (a quantity of drugs) or I want to see s*^t for real, that's what I'm paying for real. You part of the team so you know." ROGERS replied, "Where you at, I got you know, we could take, we could split the split (split narcotics profits). TERLIZZI and ROGERS agreed to meet on the west side.

32. On March 22, 2018, at approximately 5:31 p.m., ROGERS and TERLIZZI spoke again on the phone. ROGERS said to TERLIZZI, "I'm outside." ROGERS was parked in the vicinity of TERLIZZI'S home, located at XXXX W. 23rd St., Cleveland, Ohio. Shortly after the call, TERLIZZI walked onto the street from an area near XXXX West 23rd Street, Cleveland, Ohio. TERLIZZI walked across the street to a black Cadillac SUV registered to him, opened the driver's door of the Cadillac, closed it, and then walked to the front passenger door of the Cadillac and retrieved a briefcase type item from inside. TERLIZZI then walked with the briefcase to ROGERS' Ford Fusion and placed the briefcase in the front passenger compartment of the Fusion through the open passenger window. TERLIZZI entered into the front passenger

seat of the Fusion, and ROGERS departed, drove around the block, and returned to the same location a few minutes later.

33. On or about March 22, 2018 at approximately 5:38 p.m., while TERLIZZI and ROGERS were inside ROGERS' vehicle, COTA MEDINA called ROGERS. During the call, COTA MEDINA told ROGERS that "there's something tomorrow early in the morning. Okay?" ROGERS asked COTA MEDINA, "Okay, what time it's gonna be there?" COTA MEDINA responded, "I'll let you know, I'll send you all the information. You collect some the money right now?" ROGERS said, "I'm 'bout to call him...to go get the money. And, um, send you some of it." COTA MEDINA stated, "Okay. Pajaro with me here. He tells me, send me a couple of thousands. If you have something, if you can send it, I'm, I'm, no pressure. You no have to send it, you know....How much can you send?" ROGERS responded, "I'm 'bout to go see what he gonna give me and then I can send you what he got...just give me an hour." COTA MEDINA stated, "I know I had put, I put a lot of pressure, but he ("Pajaro") has to pay people in Phoenix. He has to move a couple more...I have to give a couple of thousand to the guy. He give me, give me the things. They send it (cocaine) tomorrow for sure...I think you get it Saturday."

34. On or about March 22, 2018, at approximately 5:42 p.m., TERLIZZI exited the Ford Fusion ROGERS was driving, with the briefcase, and walked behind the residence at XXXX W. 23rd Street. Approximately 30 seconds later, ROGERS exited the Fusion, walked around the back of the same location, and entered the side door on the north side of XXXX W. 23rd Street.

35. On or about March 22, 2018, at approximately 6:35 p.m., ROGERS and TERLIZZI exited from the area of XXXX W. 23rd Street. ROGERS was carrying grocery style bags, and he discarded the bags into a trash can sitting next to ROGERS' Fusion, on the opposite

side of the street from the above residence. Around the same time, TERLIZZI departed the location in the Cadillac, and ROGERS departed the location in the Fusion. Inside the trash in the grocery bags were three kilogram-sized plastic wrappers containing cocaine residue.

36. On or about March 22, 2018, at approximately 11:51 p.m., ROGERS called TERLIZZI. During the conversation, ROGERS complained, "I told ni**as, I need to see that mother f*^king cash." TERLIZZI responded, "Well you know...people be playing too many games....I am definitely interested in making a little trizzay (money selling drugs)." ROGERS said, "Okay okay, yea I see, you ready to negotiate... I am going to keep it one thousand with you. I am trying to get as much cash as I can to move them (TREVIS-GARCIA and RAMOS-NEVAREZ) from out there to in here, to the city. You know what I'm saying? Once I am in the city I can maneuver around better. I can go give homie his car back. And I can maneuver around, make some money, and like I said, straighten him on what he want. And then everyone is still happy....Those f*^kers keep calling me. It's a problem though 'cause more people calling than anything. Like now, it's just like ... man, everyone keep calling me." TERLIZZI responded, "You know if you need anything. You know. You need someone to do something. Man I'm only a call away." ROGERS said, "Aw yea.... I just don't want to step on homie's toes; whatever you all got going on." TERLIZZI said, "Yea like I told you I would like to keep our friendship, but you know I don't like doing business with homie. For real. I ain't even going to lie."

37. On or about March 23, 2018, at approximately 10:31 a.m., ROGERS called RAMOS-NEVAREZ. During the conversation, ROGERS said, "When you're ready we can go get Gil (TREVIS-GARCIA) and get this out of the way." RAMOS-NEVAREZ responded, "Oh, I don't know, you work this afternoon no with this guys." ROGERS responded, "Oh you want to go this afternoon, oh yea, I forgot we said this afternoon. I still gotta get you the money

for the room." RAMOS-NEVAREZ stated, "I no more." ROGERS said, "Okay so you don't need it no more?" RAMOS-NEVAREZ said, "No."

38. On or about March 23, 2018, at approximately 4:16 p.m., ROGERS received a call from COTA MEDINA. During the conversation, COTA MEDINA stated, "Hey, listen. I have to you put two hundred dollars to Phoenix, Arizona. The guy is sending the package. I have to send it right now. If you can.... I will send you the name and the address, too."

39. On or about March 23, 2018, at approximately 4:43 p.m., ROGERS wired \$200.00 dollars via Western Union to an individual listed as Carlos Humberto Fraijo. The expected payout location listed on the receipt was Arizona, United States.

40. On or about March 23, 2018, at approximately 4:50 p.m., ROGERS received a call from TERLIZZI. During the conversation, TERLIZZI asked ROGERS, "We was supposed to do some negotiation today, and, you had the flu?" ROGERS responded, "Nah, I was up here at the mother*^king post office." Later in the conversation, ROGERS said he was "gonna be over at the warehouse getting tightened up." TERLIZZI later asked, "So what you wanna do, just call me when you, uh?" ROGERS replied, "Yeah as soon as I'm done with them, you know." TERLIZZI informed him, "I'm gonna be back where you seen me at yesterday, over that way."

41. On or about March 23, 2018, at approximately 5:49 p.m., ROGERS received a call from DAILEY. During the conversation, DAILEY asked ROGERS, "Where you at?" ROGERS replied, "Right here in Aurora." DAILEY said, "Damn, I need to see you." ROGERS said, "Well I'm about to come to you, pick them (TREVIS-GARCIA and RAMOS-NEVAREZ) up, and come straight to you."

42. On or about March 23, 2018, at approximately 6:00 p.m., ROGERS called TREVISOGARCIA. During the conversation, ROGERS said, "I'm outside." TREVISOGARCIA replied, "Okay."

43. On or about March 23, 2018, at approximately 6:21 p.m., DAILEY called ROGERS. DAILEY asked, "Where are you at now, TY?" ROGERS responded, "I'm right here. I'm, I'm dropping them (TREVISOGARCIA and RAMOS-NEVAREZ) off and then I'm headed to you."

44. On or about March 23, 2018, at approximately 6:47 p.m., TERLIZZI called ROGERS on the phone. During the conversation, TERLIZZI said, "I need you I'm dead over here. People keep calling." ROGERS replied that he was on his way to the west side.

45. On or about March 23, 2018, at approximately 6:52 p.m., ROGERS left the warehouse located in Hudson, Ohio, and drove away in the Ford Fusion.

46. On or about March 23, 2018, at approximately 7:29 p.m., ROGERS called TERLIZZI. During the conversation, ROGERS told him, "I'm about to blow down on you, where you at?" TERLIZZI replied, "Same spot I'm just a couple houses up." ROGERS said, "So just a couple houses up, so whatcha wanna do?" TERLIZZI told him to call him when he was "coming down the street."

47. On or about March 23, 2018, at approximately 7:39 p.m., ROGERS again called TERLIZZI to say he had arrived at the street. TERLIZZI provided additional directions on where to park.

48. On or about March 23, 2018, at approximately 9:02 p.m., ROGERS called TREVISOGARCIA on the phone. ROGERS asked TREVISOGARCIA, "You ready to go?" TREVISOGARCIA responded, "Yes." ROGERS said, "Okay, alright um. I'm 'bout to be on my way down there to you. I was just over here, taking care of this for Silk (JOHNSON) and

Chewy (COTA MEDINA). And I'm on my way back, okay? Y'all done?" TREVISOGARCIA stated, "Yes." ROGERS said, "Okay no problem, here I come."

49. On or about March 23, 2018, at approximately 9:05 p.m., ROGERS received an incoming call from COTA MEDINA. During the conversation, COTA MEDINA stated, "Gil (TREVISOGARCIA) called me. He say he finished. You go for them right now?" ROGERS responded, "Yeah, I'm 'bout to stop what I'm doing and go pick 'em up."

50. On or about March 23, 2018, at approximately 9:53 p.m., ROGERS called DAILEY. During the conversation, DAILEY asked, "Where you at, TY?" ROGERS replied, "Right there on um Broadway and Fleet." Later in the conversation, DAILEY told ROGERS, "I only got the money for, big hustle ain't came yet." ROGERS responded, "That's cool. We'll figure that out in the morning. I just wanna get them out the way."

51. On or about March 23, 2018, at approximately 10:45 p.m., ROGERS received a call from TREVISOGARCIA. During the conversation, TREVISOGARCIA asked, "Where you at...it's very cold." ROGERS replied, "Yeah, I'm on my way, I'm pulling up, I'm about to be pulling up. I'm waiting on Champ (SOHRABI) to come outside." TREVISOGARCIA asked, "Champ?" ROGERS replied, "Yeah...I'm right here, here I come."

52. On or about March 23, 2018, at approximately 10:50 p.m., TREVISOGARCIA and RAMOS-NEVAREZ left the warehouse in Hudson, Ohio, and entered ROGERS' Ford Fusion, which ROGERS was driving. ROGERS departed the area, and approximately 35 minutes later, arrived at the Barrington Place Apartments. TREVISOGARCIA and RAMOS-NEVAREZ exited ROGERS' vehicle, and entered Apartment 240.

53. On or about March 24, 2018, at approximately 4:00 a.m., COTA MEDINA, JOHNSON, DAILEY, SOHRABI, TERLIZZI, ROGERS, RAMOS-NEVAREZ and TREVISOGARCIA possessed approximately 64.4 kilograms of methamphetamine, drug paraphernalia, and

tools used to “cook,” or manufacture, crystal methamphetamine, inside the warehouse at XXXX Olde Eight Road, Hudson, Ohio.

54. On or about March 24, 2018, at approximately 12:28 p.m., ROGERS received a call from SOHRABI. During the conversation, SOHRABI asked, “Where you at now?” ROGERS said, “I’m stuck in traffic on the freeway...you talking about somebody broke into shop scene?” SOHROBI replied, “Bro, f*^king window is off the thing man. The window is off all the ceiling tiles...somebody went through and his every single, seeing if somethings in the ceiling or something.” ROGERS told him, “We fittin’ to get to the bottom of this s*^t. Somebody gotta die, I don’t give a f*^k who gotta die. Somebody gotta die. I’m on my...” SOHRABI said, “What the f*^k, man.”

55. On or about March 24, 2018, at approximately 12:59 p.m., ROGERS called DAILEY. During the conversation, DAILEY asked ROGERS, “Damn you just called me five minutes ago, so did he make a police report?” ROGERS told DAILEY, “I know this is Deon’s (JOHNSON) dude but this ni**a, this ni**a fittin’ to go. I ain’t getting f*^ked, what’s going on? He talk a ni**a broke into his shop all this.... He been doing f*^k s*^t since I been down here though, like, you know what I’m saying? Ni**a tell me he gonna compensate...he’s just been doing hoe s*^t anyway....I don’t even, I ain’t into beating ni**a’s ass, I’m into getting rid of ni**as, man. You trippin’?” DAILEY then asked, “So what did he say, I mean?” ROGERS replied, “He said, man they broke into the shop, man this and that, man ni**a, I said s*^t someone fittin’ to die, ni**a. What the f*^k you talking about someone broke into your shop and then this your city?” DAILEY asked, “So they took everything?” ROGERS said, “I’m about to find out what they took now...” DAILEY later told ROGERS, “Walk around that shop and take pictures of entry and every windows.” DAILEY and ROGERS attempted to add SOHRABI to their conversation as a third party, but were unsuccessful. ROGERS said “Oh, he

(SOHRABI) must've hung up, he don't know what to do, he, he all scared." DAILEY said, "Yea, it's too late, ni**as already done put the play down."

56. On or about March 24, 2018, at approximately 1:06 p.m., ROGERS received a call from SOHRABI. During the conversation, ROGERS said, "They about to pull up at the shop, they at the green shop, we just left the green shop...we waiting on you." SOHRABI responded, "I'm over, I'm at the bike shop." SOHRABI owns a motorcycle and car shop located at XXX E. Twinsburg Road, Northfield, Ohio.

57. On or about March 24, 2018, at approximately 1:36 p.m., ROGERS called DAILEY, and said, "Something ain't right." During the conversation, DAILEY asked, "Did he come there...what did he say?" ROGERS replied, "He don't know, we trying to get a camera, we got a camera window, so we trying to figure out if we can get the video footage. That s*^t ain't gonna help nobody, video footage ain't gonna help. Nobody knew about that spot man, so how the f*^k, so how is video footage gonna help us man?" DAILEY replied, "I don't know, so as he call me Imma call you." ROGERS said, "Alright, please do."

58. On or about March 24, 2018, at approximately 2:11 p.m., ROGERS received an incoming call from JOHNSON. During the conversation, ROGERS said, "This s*^t right here real." JOHNSON asked, "What happened?" ROGERS explained, "Something, like sixty, seventy (pounds of methamphetamine), man...you know what I mean? It, it got funky. Somebody, don't nobody..." JOHNSON asked, "It got funky?" ROGERS explained, "Yeah, somebody don't know what's going on and they trying to get the video footage. I'm like, this s*^t don't add up." JOHNSON asked, "Who had access to the spot?" ROGERS said, "Nobody....they go through the window. I mean I seen the window and it didn't look like it broke in." At this point in the conversation, ROGERS handed SOHRABI the telephone so that SOHRABI could talk with JOHNSON direct. SOHRABI said, "Hey D. This s*^t is f*^ked up,

man.” JOHNSON asked, “What happened?” SHORABI responded, “I went through this morning. I went to the shop today brother. I opened the door, I went in and I seen all the ceiling tile out. I seen all that s**t gone... I didn’t even know if it was the boys. But brother, man this s*^t is in the f*^k. They put my dad, this put my dad, my family, me, everything, and TY (ROGERS) saying they coming up here and killing someone, man.” JOHNSON stated, “Put TY (ROGERS) back on the phone.” SOHRABI replied, “You know I would never do no stupid ass s*&t.... They’ll be here in twenty minutes and they killing something, man. I put my dad at life...man, listen man, I’m in a f*^k situation, my life on the line now, man. I got, I got access right here, I’ve been having access. I’m the one who had access to over 300 or 400 things (quantity of methamphetamine) right here and then I’m gonna go, like, my shop there’s only, like 50 something cars on the lot, or maybe ninety something cars.... Man, my dad’s shop...if my dad goes in there he’s gonna have a heart attack.” ROGERS took the phone back from SOHRABI and began to talk with JOHNSON. JOHNSON asked, “How many people knew about what, what, what was going on over there?” ROGERS responded, “Nobody, nobody knew about my end. You know ain’t nobody know on my end. I don’t play no games.” JOHNSON asked, “What’s the hold up with the footage, then?” ROGERS stated, “He called his (SOHRABI’s) pops. He said until Monday...he can’t get it out of the landlord until Monday.” Later in the conversation, JOHNSON asked, “Besides the workers (TREVIS-GARCIA and RAMOS-NEVAREZ), the only people that have been over there?” ROGERS replied, “That’s it, I mean, like, on my end.” Later in the conversation, JOHNSON told ROGERS, “I hope they understand they, they definitely gonna do something to someone.” ROGERS replied, “I told him somebody’s gonna go.” At this point in the conversation, SOHRABI asked to talk with JOHNSON once again. SOHRABI said, “What am I supposed to do?” JOHNSON replied, “He said the only person been there was the workers (TREVIS-GARCIA and RAMOS-

NEVAREZ), you, and him. So the reality of it is, uh, uh, either the workers been double backing and did it, or one of y'all been did it.” SOHRABI stated, “I told him last night man, let’s get this (the methamphetamine) out of here. They keep, I been telling them for the last five days, man.” ROGERS got back on the line with JOHNSON, who asked ROGERS, “Did you count it yet? How many was gone? Get through counting, just, just take, just move everything.”

59. On or about March 24, 2018, at approximately 2:28 p.m., ROGERS called DAILEY. During the conversation, DAILEY asked, “He called you?” ROGERS responded, “Yeah he called me.” DAILEY asked, “You talk to D (JOHNSON)?” ROGERS replied, “Yeah I talked to him....he gonna get to the bottom of it.” Later in the conversation, ROGERS told DAILEY, “This white boy (SOHRABI) hit this lick man, he done did that s*^t, man.” DAILEY told him “Hey you got this uhhhh, he I need you to, you know what you need to do?” ROGERS asked, “What’s that?” DAILEY directed ROGER to go to “Garmin...go to Garmin’s and get a tracking device. We about to put a tracking device on his (SOHRABI’s) car.”

60. On or about March 24, 2018, at approximately 2:43 p.m., ROGERS received a call from SOHRABI. During the call, ROGERS told him, “We gotta get to the bottom of that, I’m about to come, I’m about to be on my way back, I’m about to go get them and we bout to go do the final count.” SOHRABI acknowledged, “Alright.”

61. On or about March 24, 2018, at approximately 3:01 p.m., ROGERS called TREVISO-GARCIA. During the call, ROGERS said, “I’m coming to pick you up.” TREVISO-GARCIA replied, “Okay.”

62. On or about March 24, 2018, at approximately 3:05 p.m., ROGERS received a call from TERLIZZI. During the call, ROGERS said, “Yea, what’s his name, looking for you. He said call him.” TERLIZZI responded, “I just got off the phone with him. I was in something. Man, I don’t know what the f*^k going on, man. That s*^t crazy. I pulled up right before

you...this ain't nothing to play." ROGERS replied, "Hell no, they ain't playing....Come up with it 'cause at the end of the day you the only one that got the key (referring to SOHRABI)...You just never know who you talk to. People listen." TERLIZZI replied, "Exactly. I told you the other night, he do a little too much talking. I mean, I don't, I don't know, bro. I could see it in your face, you was furious, he, he looked lost." ROGERS stated, "Because nobody ever think, you know, these people coming to kill, you know what I'm saying? They ain't coming to, oh, oh let's work, let's fight, no, man, either you gonna pay this money, or somebody gonna die. This a life or death situation." TERLIZZI replied, "Ain't no pocket change." ROGERS agreed, and stated, "No this ain't no, we kick this under rocks, maybe one or two would have come up missing, you know what I'm saying? We could talk that. Ni**a, not sixty seven (pounds). Damn near a hundred (pounds of methamphetamine). Man, ain't nobody trying to pay that."

63. On or about March 24, 2018, at approximately 3:13 p.m., ROGERS made a call to SOHRABI. During the conversation, SOHRABI said, "I've been blowing my dad up tryin' a get this. He was like 'well I got the code if you want to go.' I'm like, 'I'm not about to go up in... (to the warehouse on Olde Eight Road, in Hudson, Ohio.)'" During the conversation, ROGERS asked, "They just took, they just, they just took the box, that's it?" SHORABI responded, "No. In the back room dude, that bitch is f*^ked, dude, and then, but in the other, they spilled all the other s*^t though (liquid methamphetamine), like it, it, it was drying (the methamphetamine cooked into "ice" or pure methamphetamine) or...I mean, not uh, with the sand in the little room. Like where they were doing it at, you said that had to wait till that stuff come off them...buckets or whatever...we gotta still go clean that s*^t up 'cause if they say that s*^t is broken into, the boys are gonna try and fingerprint that window and s*^t." Later in the conversation, ROGERS told SOHRABI, "I guess D (JOHNSON) called somebody else to call them, so I'm 'bout to go get them, you know, do the count. We 'bout to do the count and then we on our way."

64. On or about March 24, 2018, at approximately 3:23 p.m., ROGERS received an incoming telephone call from JOHNSON. During the conversation, ROGERS asked, "Is this dude (SOHRABI) your dude, dude? Like, man I'm really, you know what I'm saying? Like, come on, boy. Like, we've been here damn near a month, man. Nothing came up missing. Now that we leaving tomorrow...all of a sudden." JOHNSON responded, "That's why it happened, because he, because the, today was the last shot at it." Later in the conversation, ROGERS informed JOHNSON that "Chuy" (COTA MEDINA) was calling in. ROGERS engaged in a three-way call with JOHNSON and COTA MEDINA , who said, "Look, Pajaro (Bird) is here, Pajaro is here with me and he is asking, he asking what is going on with the clients that you had...the ones that were going to buy there?" JOHNSON replied, "We know what happened, do not worry, the guy that had... the other building...he robbed us....but don't worry. We will...take from our money for the price of the material. We are going to pay our part of the material." COTA MEDINA asked, "For the what?" JOHNSON replied, "The material that...the other guy that had the other building robbed us last night. But we are going to, we have to do something to him for, for his actions." COTA MEDINA asked, "When are you going to do that?" JOHNSON chuckled, and said, "Very soon." JOHNSON then asked ROGERS, "Did you check to see what...what was grabbed already?" ROGERS replied, "We 'bout to do the count now. I'm over here now." JOHNSON told COTA MEDINA, "He is counting it right now, brother. He is going to you back with the total." ROGERS then said, "I'm about to go get Gil (TREVIS-GARCIA) now." Later in the conversation, COTA MEDINA asked JOHNSON, "How much did they take? You know that is a huge problem, brother. This is a huge problem. If we say something here (in Mexico), they can kill me and Pajaro here for that. You know what I mean?" Later in the conversation, JOHNSON told ROGERS, "The call is made, he's (SOHRABI) through."

65. On or about March 24, 2018, at approximately 3:51 p.m., ROGERS called R.B., an individual known to the Grand Jury but not indicted herein. During the conversation, ROGERS said, "Damn man, it's over for your boy." R.B. replied, "Man I just got off the phone with him too." Later in the conversation, ROGERS said, "Oh they just, they just made the final call, it's over with...yeah they already put the green light on him, it's a wrap. I can't save him now. F*^k it...they don't even want the change, they just, they just gonna knock his head, man. It's a wrap!"

66. On or about March 24, 2018, at approximately 4:19 p.m., ROGERS arrived at 226 Barrington Place, Apartment 240, Aurora, Ohio.

67. On or about March 24, 2018, at approximately 4:20 p.m., ROGERS made an outgoing telephone call to TREVISO- GARCIA. During the conversation, ROGERS said, "Hey Gil, I'm outside." TREVISO-GARCIA replied, "Okay."

68. On or about March 24, 2018, at approximately 4:52 p.m., JOHNSON called ROGERS. During the conversation, JOHNSON said, "That's Michelle (DAILEY). I should've told Michelle to go over there. See what he (SOHRABI) was acting like. Who else up there, man?" ROGERS responded, "That's what we gonna do. Let me, you want me to call her now?" JOHNSON said, "Call her right now."

69. On or about March 24, 2018, at approximately 4:58 p.m., ROGERS participated in a conference call between several parties, including DAILEY, and JOHNSON. During the call, an unknown male asked DAILEY how she was doing. DAILEY responded, "Imma be doing better when we get rid of the trash."

70. On or about March 24, 2018, at approximately 5:43 p.m., ROGERS placed a three-way call between him, JOHNSON, and DAILEY. During the conversation, JOHNSON said about SOHRABI, "You got a chance to do the right thing, brother. For the sake of you and

your family, man." ROGERS said later, "Yea, I'mma call you on new phones. I'm 'bout to get some. I'm 'bout to go take them and put them...we're going to the new house and then I'mma call you with a new phone. DAILEY said, "What you want me to do with this one?" ROGERS replied, "After you um, get it. You know, just give, pass it. Use it until you pass out your number to everybody and then just break it."

71. On or about March 24, 2018, at approximately 5:59 p.m., ROGERS, TREVISO-GARCIA, and RAMOS-NEVAREZ were stopped inside a vehicle together.

72. Between March 22 and 24, 2018, ROGERS, TREVISO-GARCIA, SOHRABI, and RAMOS-NEVAREZ were in possession of approximately 64.4 kilograms of methamphetamine in a warehouse located at XXXX Olde Eight Road. Hudson, Ohio.

73. On or about March 26, 2018, at approximately 4:50 p.m., TERLIZZI was in possession of a quantity of cocaine, a quantity of heroin, two firearms, \$7,000 in U.S. currency, a digital scale, and other drug paraphernalia.

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(Manufacture and Possession with Intent to Distribute a Controlled Substance, and Aiding and Abetting, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A) and 18 U.S.C. § 2)

The Grand Jury further charges:

74. Between on or about March 22, 2018 and March 24, 2018, in the Northern District of Ohio, Eastern Division, Defendants JESUS COTA MEDINA, DEON JOHNSON, MICHELLE DAILEY, SHAUHEEN SOHRABI, JOSEPH TERLIZZI, TRYONE ROGERS, HECTOR MANUEL RAMOS-NEVAREZ and GILBERT TREVISO-GARCIA, did knowingly and intentionally manufacture and possess with intent to distribute 64.4 kilograms of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled

substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 3

(Possession with Intent to Distribute a Controlled Substance, and Aiding and Abetting, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and 18 U.S.C. § 2)

The Grand Jury further charges:

75. On or about March 22, 2018, in the Northern District of Ohio, Eastern Division, Defendants JOSEPH TERLIZZI and TYRONE ROGERS possessed with intent to distribute a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 4

(Felon in Possession of Firearms, in violation of 18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

76. On or about March 26, 2018, in the Northern District of Ohio, Eastern Division, Defendant JOSEPH TERLIZZI, having been previously convicted of crimes punishable by imprisonment for a term exceeding one year, that being: Trafficking Offense, in case number CR-12-564693-A, in Cuyahoga County Court of Common Pleas, on or about October 19, 2012; did knowingly possess, in and affecting interstate commerce firearms and ammunition, to wit: a Ruger, model LCP, .380mm pistol, bearing serial number 371860813, 4 rounds of .380mm ammunition; a Smith and Wesson revolver, bearing serial number 17533; and 1 box of .45 mm Automatic Ammunition, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 5

(Possession with Intent to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

77. On or about March 26, 2018, in the Northern District of Ohio, Eastern Division, Defendant JOSEPH TERLIZZI possessed with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 6

(Possession with Intent to Distribute a Controlled Substance,
in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

78. On or about March 26, 2018, in the Northern District of Ohio, Eastern Division, Defendant JOSEPH TERLIZZI possessed with intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 7

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime,
in violation of 18 U.S.C. § 924(c)(1)(A))

The Grand Jury further charges:

79. On or about March 26, 2018, in the Northern District of Ohio, Eastern Division, Defendant JOSEPH TERLIZZI did knowingly possess a firearm in furtherance of a drug trafficking crime, for which Defendant may be prosecuted in a court of the United States, that is, possession with intent to distribute mixtures or substances containing controlled substances, in violation of Title 21, Section 841(a)(1) and (b)(1)(C), United States Code, as charged in Counts 5 and 6 of the Indictment, in violation of Title 18, Section 924 (c)(1)(A), United States Code, and punishable under Title 18, Section 924(c)(1)(A)(i).

COUNT 8

(Interstate Travel in Aid of Racketeering,
in violation of 18 U.S.C. §§ 2 and 1952(a)(3))

The Grand Jury further charges:

80. Between on or about March 8, 2018 and March 24 2018, in the Northern District of Ohio, Eastern Division, Defendants HECTOR MANUEL RAMOS-NEVAREZ and GILBERT TREVISO-GARCIA did travel in interstate commerce between Mexico, the state of Arizona, and the state of Ohio, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit: a business enterprise involving the manufacture, possession, and distribution of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and then Defendants thereafter did perform and attempt to perform acts to promote, manage, carry on, and facilitate the promotion, management, and carrying on of said unlawful activity, in violation of Title 18, United States Code, Sections 1952(a)(3) and 2.

COUNTS 9-13

(Use of a Communication Facility in Furtherance of a Drug Trafficking Crime,
in violation of 21 U.S.C. § 843(b))

The Grand Jury further charges:

81. On or about the dates and approximate times listed below, in the Northern District of Ohio, Eastern Division and elsewhere, Defendants listed below did knowingly and intentionally use a communication facility, to wit: a telephone, to facilitate acts constituting a felony, under Title 21, United Stated Code, Section 846:

Count	Defendants	Date	Time
9	DEON JOHNSON TYRONE ROGERS	March 21, 2018	3:21 p.m.
10	TYRONE ROGERS JESUS COTA MEDINA	March 21, 2018	10:56 p.m.
11	TYRONE ROGERS MICHELLE DAILEY	March 22, 2018	11:26 a.m.
12	TYRONE ROGERS SHAUHEEN SOHRABI	March 24, 2018	12:28 p.m.
13	TYRONE ROGERS	March 24, 2018	3:05 p.m.

	JOSEPH TERLIZZI		
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All in violation of Title 21, United Stated Code, Section 843(b).

FORFEITURE

The Grand Jury further Charges:

82. The allegations of Counts 1-13, inclusive are hereby re-alleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853. As a result of the forgoing offenses, Defendants JESUS COTA MEDINA, DEON JOHNSON, MICHELLE DAILEY, SHAUHEEN SOHRABI, JOSEPH TERLIZZI, TYRONE ROGERS, HECTOR MANUEL RAMOS-NEVAREZ, and GILBERT TREVISO-GARCIA shall forfeit to the United States any and all property constituting or derived from any proceeds they obtained directly or indirectly as a result of the said violations; and, any and all of their property used or intended to be used in any manner or part to commit or to facilitate the commission of the said violations.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.